STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ANGUS S. KING, JR.
GOVERNOR

MARTHA KIRKPATRICK
COMMISSIONER

February 20, 2001

Mr. Orlando J. Monaco
Code 1821 LM
Department of the Navy, Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, PA 19113-2090

Re: Site 7, Work Plan for Ground-Water & Soil Investigation
Naval Air Station, Brunswick, Maine

Dear Mr. Monaco:

The Maine Department of Environmental Protection (MEDEP or Department) has reviewed the report entitled Final Letter Work Plan for Ground-Water and Soil Investigation at Site 7, dated February 8, 2001, prepared by EA Engineering, Science and Technology. Based on that review the Department has the following comments and issues.

Each comment is followed with a code that indicates whether a response is required (RR), no response is required (NR), editorial correction needed (ED); or meeting discussion requested (MTG). No response is required for editorial corrections unless the Navy disagrees with the correction.

General Comment:

The Department is disappointed that the Navy did not incorporate more of our recommendations in the Phase I investigation. By ignoring these recommendations the Navy risks State concurrence with the Record of Decision for this site if it cannot provide adequate data to support its findings and conclusions. However the Department submits the following comments knowing that the Navy has chosen to proceed at risk and has implemented Phase I of the Work Plan. (NR)

Specific Comments:

1. Figure 3, Ground-Water Flow Patterns at Site 7:

   The southern half of the contouring shown in this figure is not correct, and should be ignored and redrafted for future work plans and reports. The problem is that the groundwater elevation for MW-NASB-096 is not correct. MEDEP has since learned that the correct value is 67.70 feet (1.8 feet lower). Therefore, the contours for the southern half are actually oriented close to northeast-southwest rather than the presently shown northwest-southeast direction. The corrected map will then look like previous contours maps of the site. The work plan rendering of contours did not affect the work already performed for Phase I, but will bear on locating temporary sampling points in Phase II. Please correct. (RR &ED)

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
(207) 764-0477 FAX: (207) 764-1507

web site: www.state.me.us/dep

2. Phase 2, Step 1, Installation of Temporary Sampling Points, p. 3:

   Three temporary sampling points are described for installation at various distances downgradient of the cadmium-contaminated well, but none are planned in the upgradient direction. To determine the extent of the source area, at least 2 additional points need to be installed for upgradient sampling. (RR)

3. Phase 2, Step 1, Installation of Temporary Sampling Points, p. 4, first bullet:

   It would seem to be more efficient to collect samples from all the sampling points in the same round than to wait for results of two samples before collecting the other. (ED)

4. Phase 2, Step 1, Installation of Temporary Sampling Points, p. 4, second bullet:

   How can the cadmium-impacted groundwater be inferred to be only immediately upgradient of MW-NASB-094/MW-NASB-229 if new data are not collected upgradient? (See comment 2 above.) If no new data are obtain upgradient what existing data will be used to delineate the source area? (RR)

5. Phase 2, Step 2, Complete Excavation and Visual Survey, p. 5, last bullet:

   If the entire permeable layer down to the clay surface may be removed, two weeks following well development may not be enough waiting time prior to groundwater sampling just downgradient of a large excavation. However, if the excavated layer is medium or coarse sand with little silt, two week may be long enough for reestablishment of flow conditions. The stabilization of new subsurface chemical conditions encompassing cadmium may require months therefore, the Department will want the Navy to do confirmation groundwater sampling at some later date, before site closure can be accepted. (RR)

Thank you for the opportunity to review this report. If you have any questions or comments please call me at (207) 287-7713.

Respectfully,

Claudia Sait

Claudia Sait
Project Manager-Federal Facilities
Bureau of Remediation & Waste Management

Cf: File
Larry Dearborn-DEP
Anthony Williams-BNAS
Michael Barry-EPA
Carolyn LePage-LePage Environmental
Al Easterday-EA
Ed Benedikt